



Amber R. Will
Senior Counsel
(212) 735-8853
awill@morrisoncohen.com

June 17, 2024

VIA ECF

Hon. Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Daol Rexmark Union Station LLC, et al. v. Union Station Sole Member, LLC*,
No. 1:22-cv-06649-GHW (S.D.N.Y.)

Dear Judge Woods:

On behalf of Plaintiffs Daol Rexmark Union Station LLC (“Union Station Sub”) and Kookmin Bank Co, Ltd., in its capacity as trustee (“Trustee”) of KTB CRE Debt Fund No. 8, a Korean Investment Trust (the “Trust”), by its agent on behalf of the Trust in Korea, Daol Fund Management Co. (“Daol”), and by its agent on behalf of the Trust in the United States, Rexmark Holdings LLC d/b/a Rexmark (“Rexmark,” collectively with Union Station Sub, Trustee, the Trust, and Daol, “Lender”), we write in response to the Rule 4(ii) letter filed by Defendant Union Station Sole Member, LLC (“USSM”) on June 17, 2024 (ECF Doc. No. 181).

For the same reasons that the moving and opposition papers do not contain sensitive, proprietary business information that warrants sealing (*see* ECF Doc. Nos. 155, 173), the reply papers need not be redacted. Lender respectfully requests the Court to deny USSM’s sealing requests as it pertains to Lender’s Motion for Summary Judgment.

Respectfully,

/s/ *Amber R. Will*

Amber R. Will

cc: All counsel of record, via ECF